

EXHIBIT 10

PUBLIC REDACTED VERSION

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

ANIBAL RODRIGUEZ AND JULIE ANNA
MUNIZ, individually and on behalf of all other
similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688

**DEFENDANT GOOGLE LLC’S SECOND
SUPPLEMENTAL OBJECTIONS AND
RESPONSES TO PLAINTIFFS’
INTERROGATORIES, SET SIX**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Action Filed: July 14, 2020

PROPOUNDING PARTY: PLAINTIFFS ANIBAL RODRIGUEZ AND JULIEANNA MUNIZ

RESPONDING PARTY: DEFENDANT GOOGLE LLC

SET NO.: SIX (SECOND SUPPLEMENTAL RESPONSES)

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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“Federal Rules”), Defendant Google LLC hereby submits its second supplemental objections and responses to Plaintiffs’ Sixth Set of Interrogatories, Set Six.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. Each of Google’s responses is subject to, and incorporates, the following general objections. Google specifically incorporates each of these general objections into its responses to each of Plaintiffs’ Interrogatories, whether or not each such general objection is expressly referred to in Google’s responses to a specific Interrogatory.

2. Google objects to the instructions, definitions, and Interrogatories to the extent that they are broader than, or attempt to impose conditions, obligations, or duties beyond those required by the Federal Rules and/or the Local Rules. Google’s responses will be provided in accordance with the Federal Rules and the Local Rules.

3. Google objects to any Interrogatory to the extent that it is overbroad, unduly burdensome, compound, and/or oppressive, or purports to impose upon Google any duty or obligation that is inconsistent with or in excess of those obligations that are imposed by the Federal Rules, the Local Rules, or any other applicable rule or Court order. In particular, Google objects to any Interrogatory to the extent that it calls for information not relevant to the claims or defenses of the parties, or not proportional to the needs of this case.

4. Google objects to each Interrogatory to the extent it is vague, ambiguous, overly broad, or unduly burdensome as to time frame.

5. Google objects to each Interrogatory to the extent that it purports to attribute any special or unusual meaning to any term or phrase.

6. Google objects to each Interrogatories to the extent they seek confidential, proprietary, or trade secret information of third parties.

7. Google’s objections and responses to these Interrogatories are not intended to waive or prejudice any objections Google may assert now or in the future, including, without limitation, objections as to the relevance of the subject matter of any Interrogatory, or as to the admissibility

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1 of any information or category of information at trial or in any other proceedings. Google
2 expressly reserves any and all rights and privileges under the Federal Rules of Civil Procedure, the
3 Federal Rules of Evidence, the Local Rules, and any other applicable laws or rules, and the failure
4 to assert such rights and privileges or the inadvertent disclosure by Google of information
5 protected by such rights and privileges shall not constitute a waiver thereof, either with respect to
6 these responses or with respect to any future discovery responses or objections.

7 8. Google has responded to the Interrogatories as it interprets and understands them. If
8 Plaintiffs subsequently assert an interpretation of any Interrogatory that differs from Google’s
9 understanding of that Interrogatory, Google reserves the right to supplement its objections and/or
10 responses. Google objects to each and every one of the purported Instructions as unduly
11 burdensome and inconsistent with the Federal Rules and Local Rules.

12 9. Discovery in this matter is ongoing. Accordingly, Google reserves the right to
13 change, amend, or supplement any or all of the matters contained in these responses as Google’s
14 investigation continues, additional facts are ascertained, analyses are made, research is completed,
15 and additional documents are subsequently discovered, collected, and/or reviewed.

OBJECTIONS TO DEFINITIONS

16
17 10. Google objects to the definition of the terms “GOOGLE,” “YOU,” and “YOUR” as
18 incomprehensible. Google construes GOOGLE, YOU, and YOUR to mean Google LLC. Google
19 further objects to this definition to the extent that it purports to include forms of information not
20 discoverable under the Federal Rules, the Local Rules, or any other applicable authority.

21 11. Google objects to the definition of “ALL” as overbroad and nonsensical.

22 12. Google objects to the definition of the terms “AUTHENTICATED DATA” and
23 “UNAUTHENTICATED/PSEUDONYMOUS DATA” as vague, ambiguous, unintelligible,
24 and/or unrelated to this case. Plaintiffs appear to have used terminology that relates to other
25 litigation in which Plaintiffs’ counsel are involved, but that has no bearing in this case.
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1 13. Google objects to the definition of “CLASS PERIOD” as vague, ambiguous, and
2 overbroad. Plaintiffs’ definition of the class period in this case is circular and legally
3 impermissible.

4 14. Google objects to the definition of “GOOGLE” as overbroad.

5 15. Google objects to the definition of the terms “DESCRIBE,” “DESCRIPTION,”
6 “CONCERNING,” “ASSOCIATED,” and “RELATING TO” as overbroad, oppressive, and
7 circular.

8 16. Google objects to the definition of the terms “FINGERPRINTING” as vague,
9 ambiguous, and/or unrelated to this case.

10 17. Google objects to the definition of the terms “INCLUDE” or “INCLUDING” as
11 circular and vague.

12 18. Google objects to the definition of “USER” as ambiguous, overbroad, unduly
13 burdensome, and partially irrelevant, including because it purports to incorporate the vague,
14 ambiguous, and overbroad term “service” without limitation, and also purports to include
15 applications that use Firebase SDK writ large.

16 19. Google objects to the definition of the terms “WAA OFF DATA” as ambiguous,
17 overbroad, unduly burdensome, and partially irrelevant, including because it purports to seek
18 “data generated by a user’s use of non-GOOGLE apps that employ or embed any GOOGLE
19 service” without limitation to the services at issue in this action.

20 **RESPONSES TO INTERROGATORIES**

21 **INTERROGATORY NO. 12:**

22 State the numbers of unique GOOGLE Accounts, for which the user disabled (i.e., “turned
23 off”) WAA or sWAA during the Class Period, associated with the following three geographical
24 locations: the world, the United States, and California. Include, in your answer:

25 a) The number of unique GOOGLE Accounts for which the user disabled (i.e., turned
26 “off”) WAA or sWAA at least once during the class period.

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b) The number of unique GOOGLE Accounts (i) for which the user disabled (i.e., turned “off”) WAA or sWAA at least once during the class period, AND (ii) the geographical and/or geolocation data, associated with the Account, indicate that the user resided in the United States during any part of the Class Period.

c) The number of unique GOOGLE Accounts (i) for which the user disabled (i.e., turned “off”) WAA or sWAA at least once during the class period, AND (ii) the geographical and/or geolocation data, associated with the Account, indicate that the user resided in California during any part of the Class Period.

RESPONSE TO INTERROGATORY NO. 12:

Google objects to this Interrogatory as vague and ambiguous as to several undefined terms and phrases susceptible to multiple meanings. For purposes of this response, Google construes “Google” to mean Google LLC and “WAA” to mean the account-level setting called Web & App Activity. Google further objects to this Interrogatory as overbroad, unduly burdensome, and abusive to the extent it seeks information “associated” with Google Accounts around “the world” and across “the United States,” both of which are beyond the jurisdictional scope of this action. Google further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows: From July 27, 2016 to July 27, 2020, [REDACTED] Google Accounts in the United State turned off Web & App Activity settings for any period of any time.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12:

Subject to and without waiving the foregoing, Google responds further as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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1 [REDACTED]
2 [REDACTED].
3 From July 27, 2016 to July 27, 2020, [REDACTED] Google accounts in the United
4 States turned off the “sWAA” setting for any period of any time.

5 Google will supplement Interrogatory No. 12 during expert discovery to the extent a
6 continued diligent search uncovers additional responsive information.

7 **INTERROGATORY NO. 13:**

8 Please IDENTIFY and DESCRIBE every GOOGLE dashboard, bit, field, or tracking tool
9 that currently contains or previously during the CLASS PERIOD contained any information
10 related to the WEB & APP ACTIVITY status (e.g., disabled vs. enabled, including for WAA
11 and/or sWAA) of any GOOGLE Account, including aggregated statistics. This Request includes a
12 DESCRIPTION of all information available (or previously available) from that dashboard, bit,
13 field, or tracking tool. This Interrogatory includes any dashboard, bit, field, or tracking tool that
14 includes or included information regarding revenues associated with traffic according to WEB &
15 APP ACTIVITY status.

16 **RESPONSE TO INTERROGATORY NO. 13:**

17 Google objects to this Interrogatory as vague and ambiguous as to several undefined terms
18 and phrases susceptible to multiple meanings. For purposes of this response, Google construes
19 “Google” to mean Google LLC and “WAA” to mean the account-level setting called Web & App
20 Activity. Google additionally objects to this Interrogatory as vague, ambiguous, and confusing as
21 to the use of the undefined phrase “dashboard, bit, field, or tracking tool” and “status . . . of any
22 Google Account, including aggregated statistics.” Google further objects to this Interrogatory as
23 overbroad, unduly burdensome, and abusive to the extent it seeks information that is not relevant
24 to any claim or defense in this Action, including because it seeks information concerning “every
25 Google dashboard, bit, field, or tracking tool” containing “any information related to the Web &
26 App Activity status of any Google account” without limitation to data sent to Google by
27 third-party app developers after collection, if any, through GA for Firebase, Cloud Messaging, or
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AdMob—i.e. concerning, Plaintiff’s theory of wrongdoing in the Third Amended Complaint. Google further objects to this Interrogatory or overbroad and unduly burdensome to the extent that Google does not have a central source of dashboards or tracking tools. Google further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows: Google maintains the “My Activity Metrics” dashboard, which provides certain measurements of Google account interactions with the Web & App Activity setting; the “Web & App Activity Log,” which tracks Web & App Activity on-and-off events for all Google Account IDs on an individual level; and the “User Attributes” table, which contains information about a user’s Google Account settings, including their Web & App Activity setting.

INTERROGATORY NO. 14:

Please IDENTIFY every data source (including logs) that includes or during the CLASS PERIOD included WAA OFF DATA. For each such data source, please include a list of field names and descriptions, the retention period, and how such data sources are used.

RESPONSE TO INTERROGATORY NO. 14:

Google objects to this Interrogatory as vague and ambiguous as to several undefined terms and phrases susceptible to multiple meanings. For purposes of this response, Google construes “Google” to mean Google LLC and “WAA” to mean the account-level setting called Web & App Activity. Google additionally objects to this Interrogatory as vague, ambiguous, and confusing as to the use of THE undefined phrases “every data source (including logs),” and “how such data sources are used.”

Google further objects to this Interrogatory as overbroad, unduly burdensome, and abusive to the extent it seeks data sources without limitation to data sent to Google by third-party app developers after collection, if any, through GA for Firebase, Cloud Messaging, or AdMob—i.e. concerning, Plaintiff’s theory of wrongdoing in the Third Amended Complaint.

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1 Google further objects to this Interrogatory as overbroad, unduly burdensome, and
2 compound because it seeks an identification of every “data source (including logs)” without a
3 clear definition of what Plaintiffs consider to qualify as a “data source.”

4 Google further objects to this Interrogatory as overbroad, unduly burdensome, and abusive
5 to the extent it seeks information regarding all uses of “WAA OFF DATA” without limitation to
6 data sent to Google by third-party app developers after collection, if any, through GA for
7 Firebase—i.e. concerning Plaintiff’s theory of wrongdoing in the Third Amended Complaint.

8 Google further objects to this Interrogatory to the extent that it seeks information protected
9 by the attorney-client privilege and/or the attorney work product doctrine.

10 Subject to and without waiving the foregoing, Google responds as follows:

11 Google has provided exacting detail of its main logs associated with the transmission of
12 app-interaction / measurement data to Google via Google Analytics for Firebase when a user has
13 turned WAA to “off,” *inter alia*, in response to Plaintiffs’ Interrogatory No. 1. Google has also
14 provided samples of those primary logs that store the transmitted data, and is investigating further
15 potential data sources that may contain such data. Google states, however, that it is not practical or
16 relevant to account for every single potential data source (including logs) that may contain such
17 data because there are various downstream users of the pseudonymous data described in response
18 to Plaintiffs’ Interrogatory No. 1. Nevertheless, the policies in place as described in response to
19 Interrogatory No. 1, including the policies that forbid the re-association of pseudonymous data
20 with personal identifiers, apply to all such downstream users of the data.

21 **INTERROGATORY NO. 15:**

22 Please DESCRIBE how GOOGLE currently uses and previously during the CLASS
23 PERIOD has used WAA OFF DATA, including by explaining the extent to which and how
24 GOOGLE currently uses and previously during the CLASS PERIOD used WAA OFF DATA to
25 track or measure conversions and personalize advertisements.

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**RESPONSE TO INTERROGATORY NO. 15:**

Google objects to this Interrogatory as vague and ambiguous with respect to the phrases “track or measure conversions” and “personalize advertisements.” Google objects to this Interrogatory as vague and ambiguous as to several undefined terms and phrases susceptible to multiple meanings. For purposes of this response, Google construes “Google” to mean Google LLC and “WAA” to mean the account-level setting called Web & App Activity.

Google further objects to this Interrogatory as overbroad, unduly burdensome, and abusive to the extent it seeks information regarding all uses of “WAA OFF DATA” without limitation to data sent to Google by third-party app developers after collection, if any, through GA for Firebase—i.e. concerning Plaintiff’s theory of wrongdoing in the Third Amended Complaint. Google further objects to this Interrogatory as duplicative, including because Google has already responded to an interrogatory describing “what occurs when users . . . turn off (or previously paused) Web & App Activity.”

Google further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds as follows: Google hereby incorporates its response and supplemental responses to Plaintiffs’ Interrogatory No. 1 as if set forth here, and objects to this Interrogatory to the extent it is duplicative of Interrogatory No. 1. In addition to Google’s responses to Interrogatory No. 1, Google responds here that it uses data sent to it via Google Analytics for Firebase for each of the uses described in its Privacy Policy and Google Analytics for Firebase Terms of Service, according to the settings and consents provided by both end users and Firebase customers. This includes pseudonymous conversion tracking and ad targeting for anonymized ad profiles.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15

Subject to and without waiving the foregoing, Google responds further as follows:

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 16:

Please DESCRIBE all facts that support or undermine a defense or affirmative defense that YOU have asserted, intend to, will, or may assert in the present litigation.

RESPONSE TO INTERROGATORY NO. 16:

Google objects to this Interrogatory as compound and unduly burdensome. Google objects to this Interrogatory as vague and ambiguous with respect to the phrase “support or undermine a defense or affirmative defense.” Google further objects to this Interrogatory because it prematurely seeks expert opinion. Google further objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege and/or the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Google responds that it is willing to meet and confer with Plaintiffs over an appropriate response to this Interrogatory, including with respect to how to address its compound nature.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16:

Subject to and without waiving the foregoing, Google responds further as follows:

App developers who use the GA for Firebase SDK must agree to Google Analytics Terms of Service, which requires that app developers disclose the use of Google Analytics and how it collects and processes data. See <https://firebase.google.com/terms/analytics>;

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1 <https://marketingplatform.google.com/about/analytics/terms/us/>. App developers who use GA for
2 Firebase SDK have been expected to comply with the Google Analytics Terms of Service and/or
3 the GA for Firebase Terms of Service, including disclosing to end users that they use Google’s
4 analytics services, and that certain data is being collected by the app developer and transmitted to
5 Google to store, process, and analyze.

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 If the data was generated while WAA was off, the [REDACTED] and
20 therefore not used for personalized advertising purposes. Users also have the option to configure
21 their device and account settings to control whether ads are personalized. *See, e.g.,*

22 https://support.google.com/accounts/answer/2662922#stop_goog_p13n. [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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1 Google has learned through the course of named plaintiff depositions that each named
2 Plaintiff lacks Article III standing as well as standing to sue more generally because none has
3 suffered an injury. What follows are Google’s legal contentions concerning Plaintiffs’ standing.

4 First, Plaintiffs Cataldo and Santiago did not suffer any injury because they manufactured
5 their injuries in this case. Each of them first turned off their WAA control after learning of the
6 substance of their allegations in this case. They subsequently willingly engaged with the very apps
7 they alleged were working a violation of their privacy. Plaintiff Rodriguez lacks standing because
8 he only had his WAA control off for seven days during the proposed class period, and during
9 those ten days, he had his [REDACTED] [REDACTED]

10 [REDACTED]. Further, he confirmed in testimony that he
11 would not have changed his behavior in a but-for world because, after making his allegations in
12 this case, he did not change any of his behavior, and instead willingly submitted to the alleged
13 violations of privacy. And Plaintiff Harvey admitted during her deposition that she did not turn
14 WAA on or off for any particular reason, and that she has not changed her behavior since filing
15 this case despite the alleged violations of privacy. Finally, both Plaintiff Rodriguez and Plaintiff
16 Harvey refused to testify when given the opportunity to do so that, if the Court rules Google’s
17 practices are lawful, they would change any of their behavior to avoid the alleged violations of
18 privacy.

19 **INTERROGATORY NO. 17:**

20 Please DESCRIBE all facts concerning the revenue and profits that GOOGLE generates or
21 receives related to the collection, storage, or use of WAA OFF DATA including for each year
22 during the CLASS PERIOD:

- 23 a. The amount of those revenue and profits by year and month
24 b. How those revenue and profits are and have been generated;
25 c. GOOGLE’s total revenue and profits related to GOOGLE Analytics;
26 d. What percentage of the revenue and profits reported in response to subparagraph (c)
27 were generated based on WAA OFF DATA;

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e. Google’s total revenue and profits related to AdMob;

f. What percentage of the revenue and profits reported in response to subparagraph (e) were generated based on WAA OFF DATA;

g. How said revenue and profits are and have been accounted for within or attributed to the profit and costs centers of GOOGLE, specifying any GOOGLE products, services, teams, and accounting units;

h. The amount of said revenue and profits attributed to the profit and costs centers of GOOGLE, specifying any GOOGLE products, services, teams, and accounting units, described by year and month; and

i. The amount of those revenues broken down by region, including for the United States and California

j. An IDENTIFICATION of all documents relied on in responding to this Interrogatory.

RESPONSE TO INTERROGATORY NO. 17:

Google objects to this Interrogatory as compound. Google objects to this Interrogatory as vague and ambiguous as to several undefined terms and phrases susceptible to multiple meanings. For purposes of this response, Google construes “Google” to mean Google LLC and “WAA” to mean the account-level setting called Web & App Activity. Google additionally objects to this Interrogatory as vague, ambiguous, and confusing as to the use of THE undefined phrases “generates or receives,” “collection, storage, or use,” “generated,” “accounted for within,” “attributed to,” “profit and costs center,” and “relied on.”

Google further objects to this Interrogatory as overbroad, unduly burdensome, and abusive to the extent it seeks revenue and profits, without limitation to revenue attributed to data sent to Google by third-party app developers after collection, if any, through GA for Firebase, Cloud Messaging, or AdMob—i.e. concerning Plaintiff’s theory of wrongdoing in the Third Amended Complaint.

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1 Google further objects to this Interrogatory as overbroad and unduly burdensome to the
2 extent Google does not track its revenues or profits as connected to the collection, storage, or use
3 of “WAA OFF DATA,” as defined by Plaintiffs. Google also objects to this Interrogatory as
4 overbroad and unduly burdensome to the extent Google does not track revenues or profits for
5 Google Analytics or AdMob.

6 Google further objects to this Interrogatory to the extent that it seeks information protected
7 by the attorney-client privilege and/or the attorney work product doctrine.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17:

8 Subject to and without waiving the foregoing, Google responds further as follows:

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 Where advertising is discussed below, it is in reference to App Campaigns, which are ad
21 campaigns advertisers who have GA4F enabled in their apps will run to drive installs or re-
22 engagement with their apps. See [https://support.google.com/google-
23 ads/topic/10011871?hl=en&ref_topic=10287124,3181080,3126923](https://support.google.com/google-ads/topic/10011871?hl=en&ref_topic=10287124,3181080,3126923). Further, Google interprets
24 this interrogatory to exclude signed-out users.

25 ***First***, when a user has sWAA on, as well as GAP, and does not have LAT or OOOAP
26 enabled, and the developer has enabled Google Signals and linked their GA4F property to Google
27 Ads, and the user is considered neither a Unicorn (under 13) or a Dasher account (enterprise), app
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1 measurement data from GA4F [REDACTED],
2 which can subsequently be used for interest-based advertising, depending on the user’s privacy
3 settings at the time of ad serving (*i.e.*, if they have GAP on and have not enabled LAT or
4 OOOAP). Google understands this revenue stream to be outside the scope of this case, because it
5 depends on the user having sWAA on at the time the app measurement data was generated.
6 Google does not use app measurement data generated while a user is signed in and has sWAA off
7 (which is necessarily off when WAA is off) for personalized advertising (*i.e.*, interest-based
8 advertising).

9 **Second**, when a GA4F developer has linked their Analytics property to a Google Ads
10 account, that enables conversion tracking under appropriate circumstances. *See, e.g.*,
11 <https://support.google.com/google-ads/answer/1722054>. On Android, GA4F conversions are
12 registered using the pseudonymous identifier ADID; they could also be registered using GAIA if
13 the user has sWAA turned on as well as other privacy settings configured properly (GAP on, NAC
14 on, LAT off) and if the developer has enabled Google Signals. On iOS, GA4F registers
15 conversions using the pseudonymous identifier IDFA. If the iOS IDFA is zeroed out because the
16 user has enabled LAT or clicked “Don’t Allow” on the App Tracking Transparency prompt,
17 GA4F would be unable to directly associate app-install conversions with ad impressions and
18 clicks which drove them. Regardless, no data in this scenario would be written to UUAD or used
19 for personalized advertising. App developers can also use third parties to track conversions, such
20 as AppsFlyer and Kochava. *See* [https://support.google.com/google-](https://support.google.com/google-ads/answer/9260620?hl=en&ref_topic=11069497)
21 [ads/answer/9260620?hl=en&ref_topic=11069497](https://support.google.com/google-ads/answer/9260620?hl=en&ref_topic=11069497).

22 [REDACTED]
23 [REDACTED]
24 In a process called attribution, Google serves as an accountant for the app
25 developer/advertiser, determining if the ad interaction and the conversion recorded by GA4F or by
26 a third party SDK were made by the same device or user so the developer/advertiser can measure
27
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1 the effectiveness of the ad campaign. *See id.* (discussing how to track conversions with Firebase
2 and third-party providers such as AppsFlyer and Kochava).

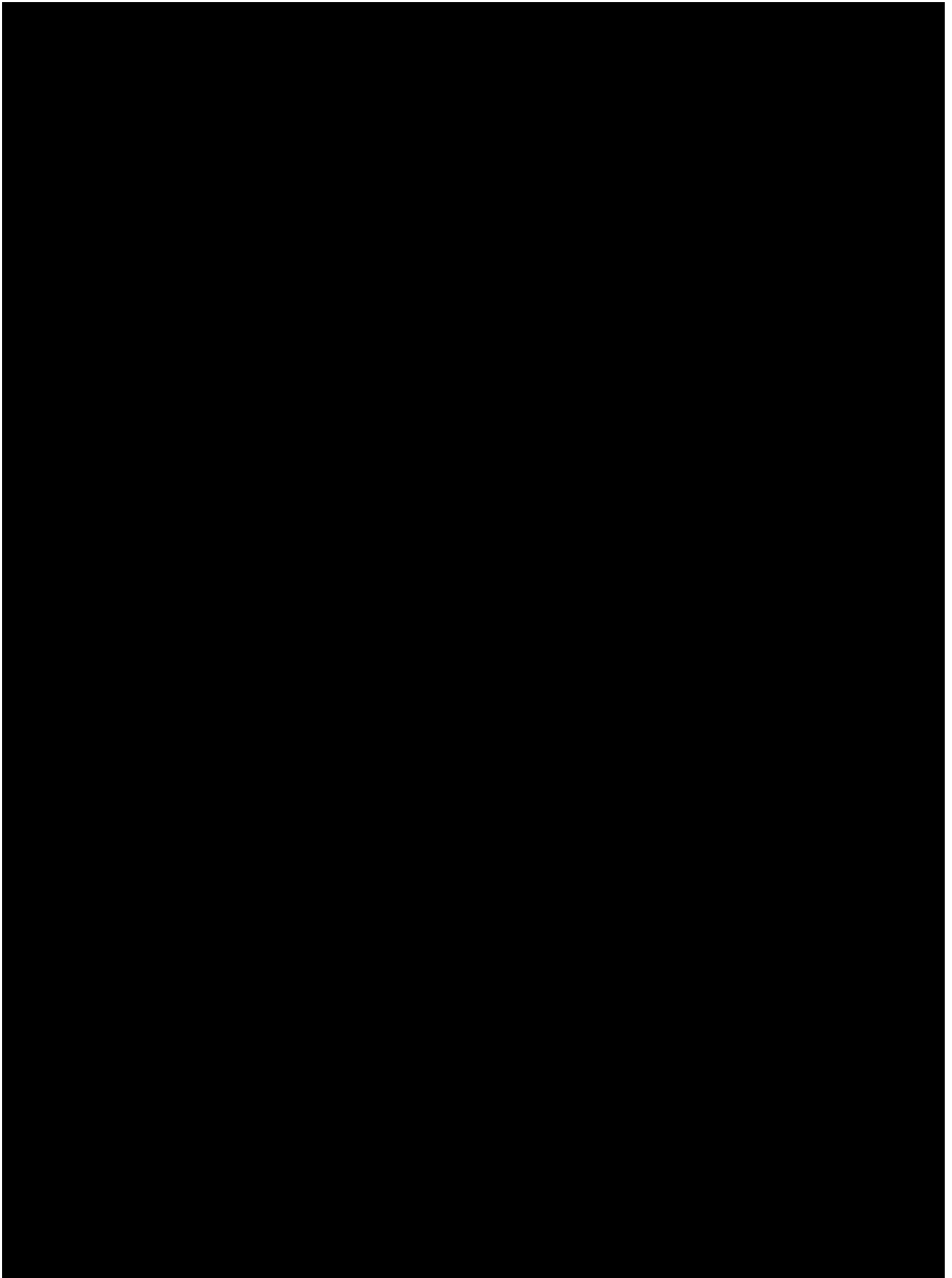
3 Google tracks app campaign ad spend that is bid against different types of conversions. [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

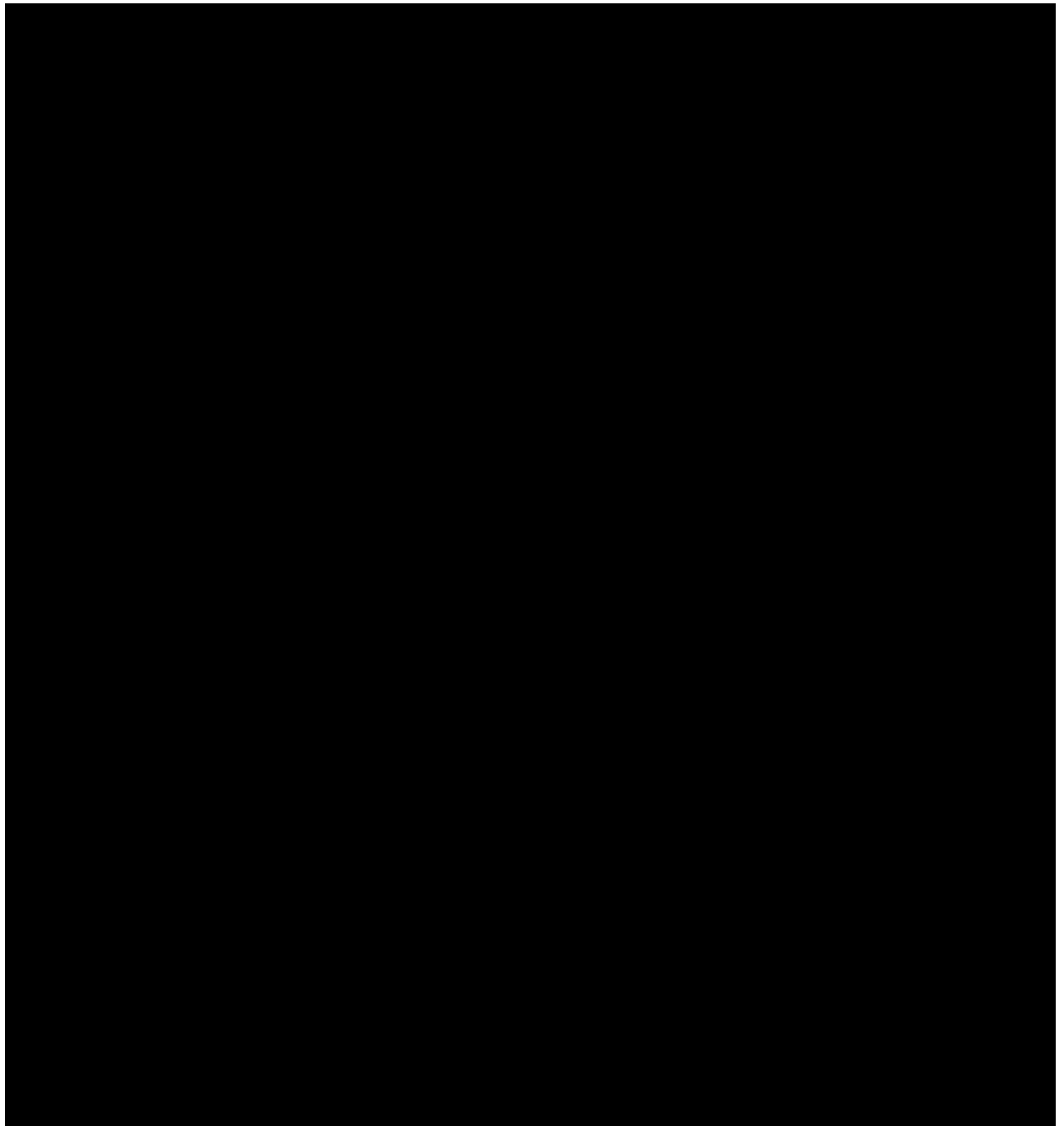
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
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28 [REDACTED]

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1 [REDACTED] were produced at
2 GOOG-RDGZ-00184247 (2017-2020) and GOOG-RDGZ-00185744 (2021). [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 **SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17:**

10 Subject to and without waiving the foregoing, Google responds further as follows:

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

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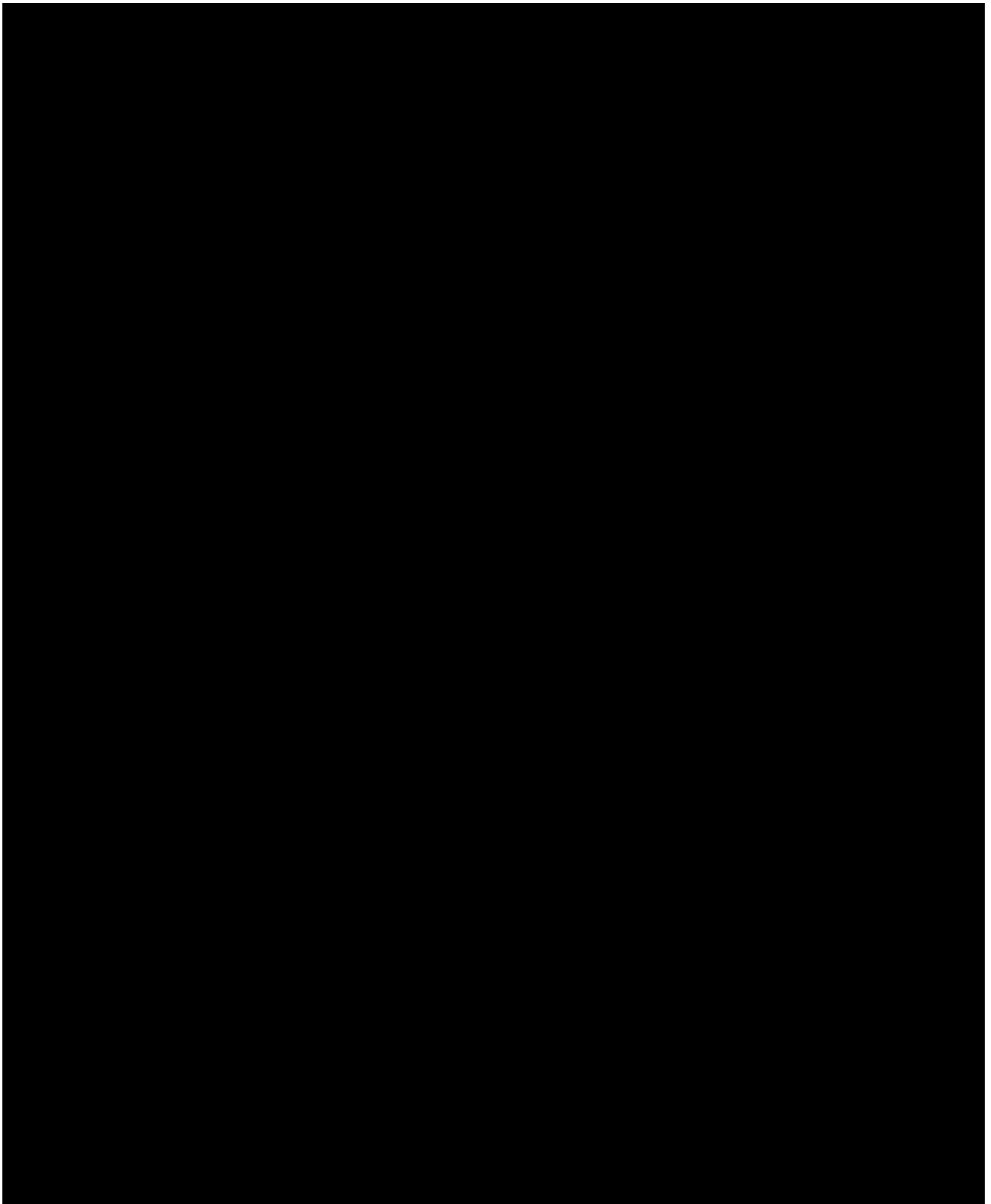
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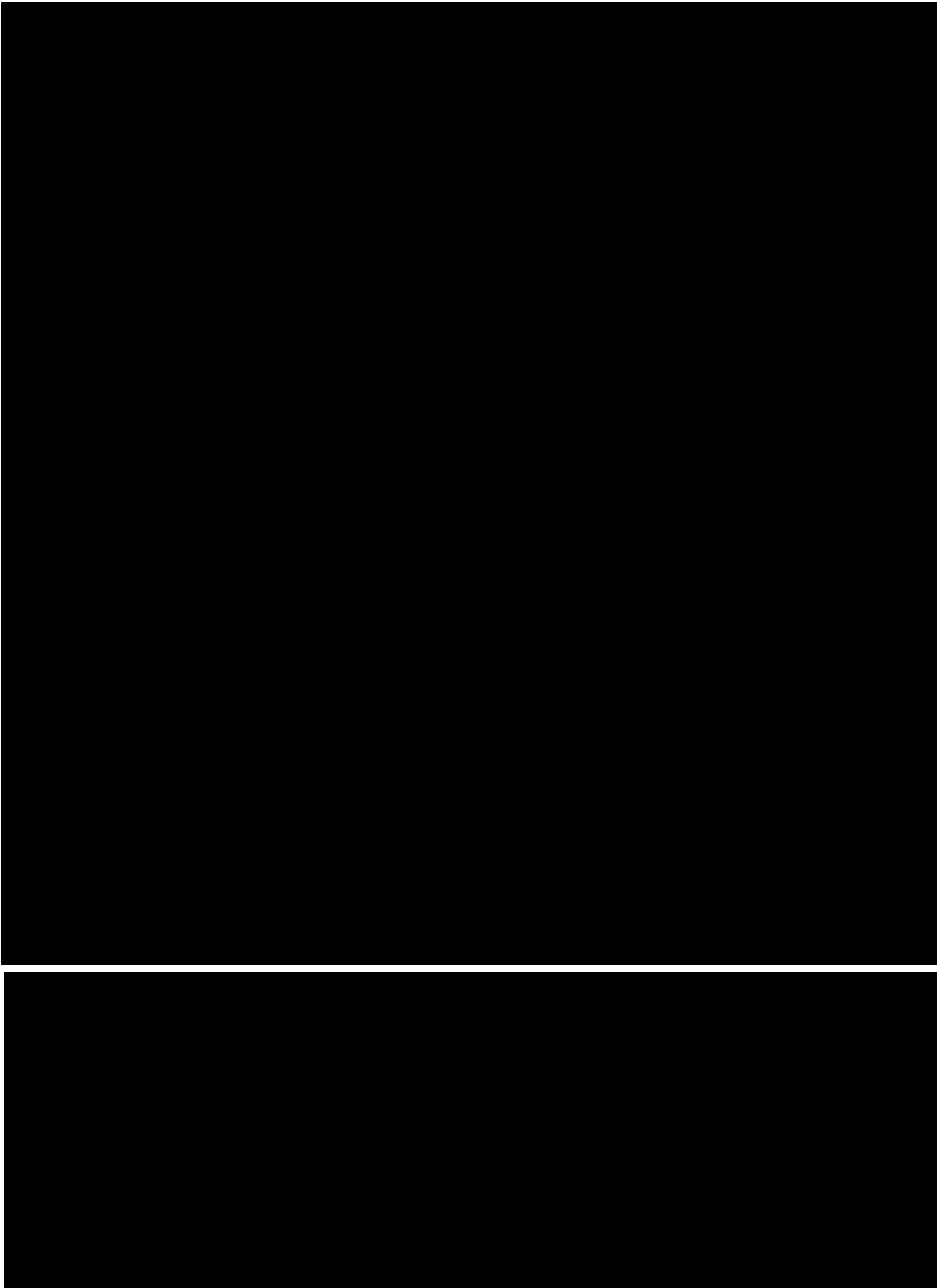
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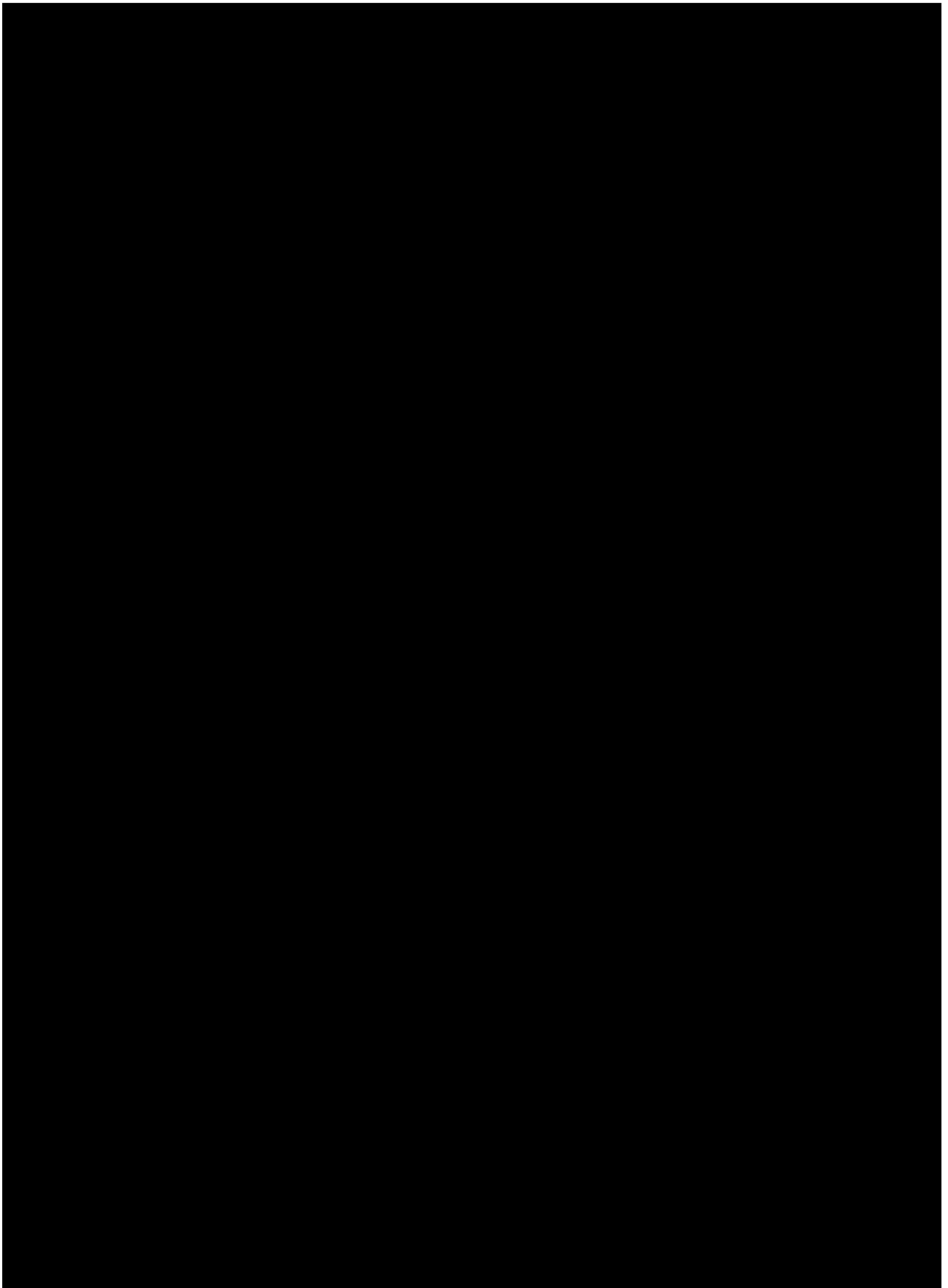
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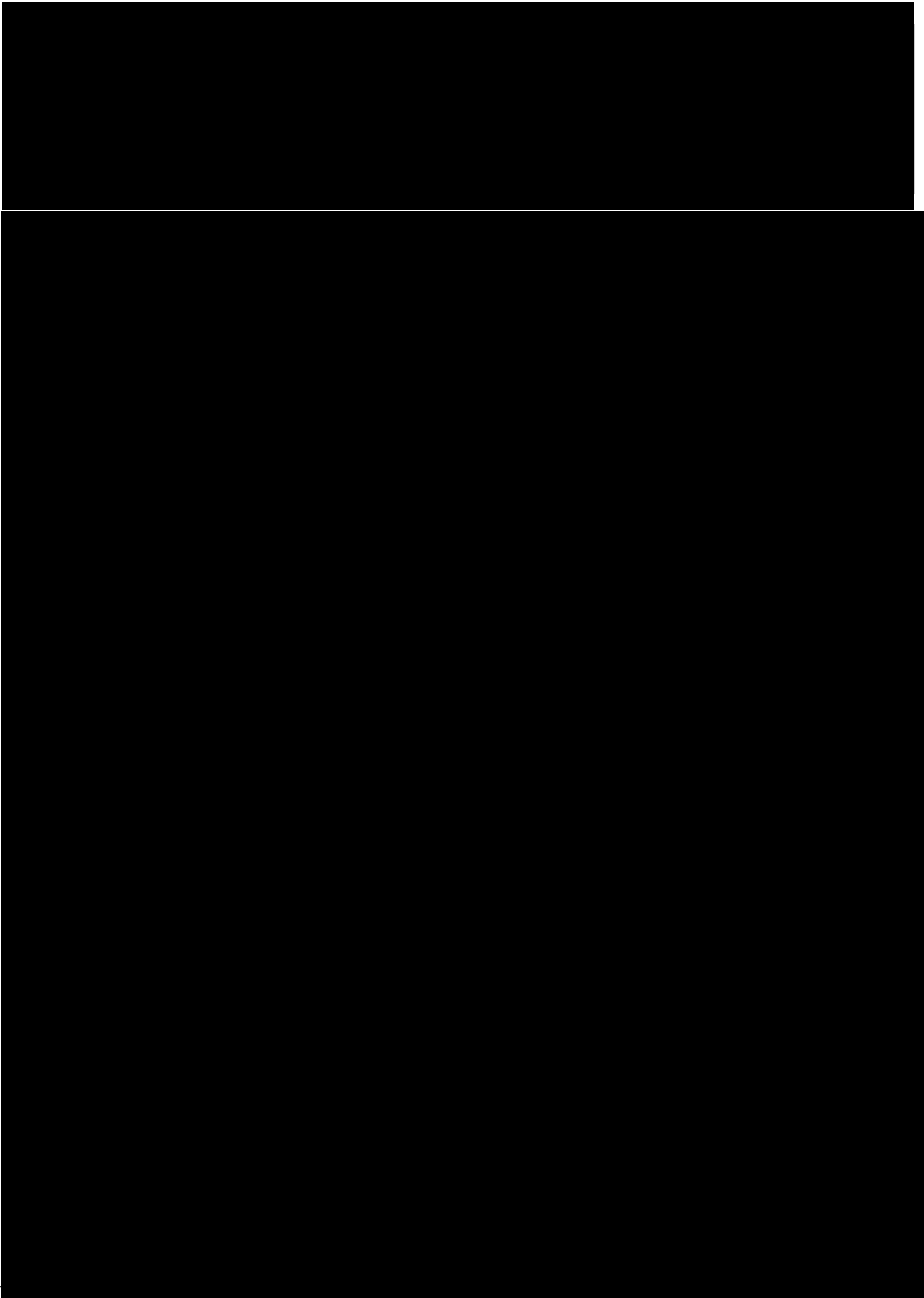
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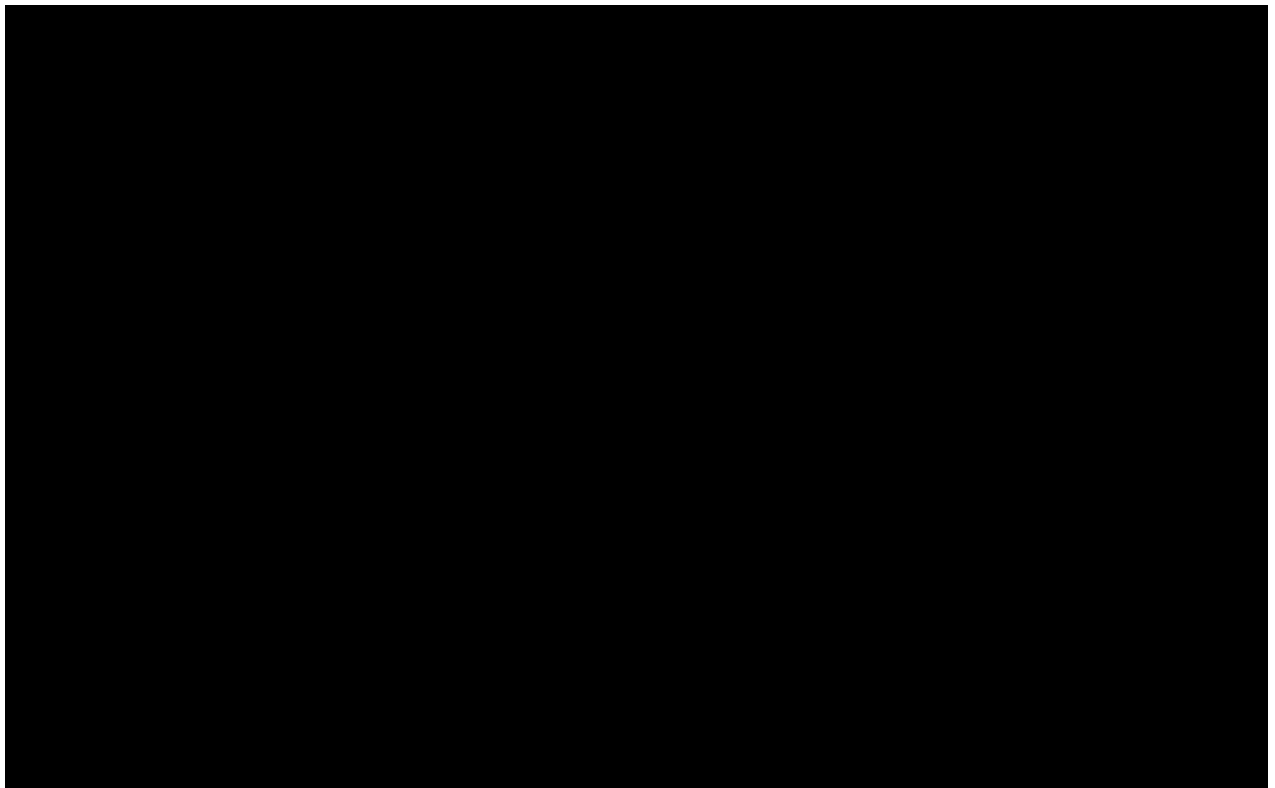


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Dated: February 14, 2023

WILLKIE FARR & GALLAGHER LLP

By: /s/ Eduardo E. Santacana

Eduardo E. Santacana

Attorneys for Defendant Google LLC

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PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is Willkie Farr & Gallagher LLP, One Front Street, San Francisco, CA 94111.

On February 14, 2023, I served the following document(s) on the individuals identified below:

DEFENDANT GOOGLE LLC’S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFFS’ INTERROGATORIES, SET SIX

- ☒ by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe “pdf” format. The transmission was reported as complete and without error.

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Executed on February 14, 2023 at San Francisco, California.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

/s/ Marsi Allard

Marsi Allard